



COLORADO

Energy & Carbon Management Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801
Denver, CO 80203

www.colorado.gov/ecmc

WARNING LETTER # 404156271

04/07/2025

PDC ENERGY INC (# 69175)
RANDY THWEATT
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1099 18TH STREET SUITE 1500
DENVER, CO 80202

STROMBERGER FEDERAL 20-12 (API# 123-24461)
SESE, 12, 4N, 66W, WELD

This Warning Letter is to inform you that PDC ENERGY INC (“Operator”) may be in violation of the rules and regulations of the Colorado Energy and Carbon Management Commission (“ECMC”) and corrective action is required.

ECMC has reasonable cause to believe that Operator has committed one or more violations of the Oil and Gas Conservation Act, or of a rule, regulation, or order of the Commission, or of a permit issued by the Commission. Operator is required to comply with this Warning Letter by the **Corrective Action Deadline Date(s)** to resolve the alleged violation(s). Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which ECMC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

Alleged Violation(s) and Required Corrective Action(s):

417 Mechanical Integrity Testing

Violation Date: 02/28/2025

Violation Discovery Date: 04/07/2025

Description of Alleged Violation: Pursuant to Rule 417.e., Operator is required to submit notice to the Director on a Form 42, Field Operations Notice - Mechanical Integrity Test ("MIT"), at least ten (10) days prior to conducting an MIT and submission of MIT results (successful or not) on a Form 21, within thirty (30) days after the test. If an MIT is not witnessed by ECMC staff, a pressure chart must accompany this Form 21 report.

MIT performed on 2/25/2025 (Doc: 404149630) was not noticed properly. Most recent notice prior to MIT was supplied with Doc: 404077433 on 1/31/2025 for an operation date of 2/05/2025.

Similar failures to properly notice an MIT were present with the following wells:

Garcia 31-5 (123-163338) - Form 21: 404151710

KISSLER K21-21D (123-31689) - Form 21: 404151831

Required Corrective Action: Operator shall provide ECMC Engineering with a written plan to adjust operational practices to ensure future MIT's are properly noticed as per Rule 417.e.

Corrective Action Deadline Date: 04/25/2025



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How to Comply with Warning Letter:

Operator shall complete the Required Corrective Action(s) above within the deadline(s) provided. Upon completion of the Corrective Action(s), Operator shall provide notice and evidence of completion to the ECMC staff identified below by the Corrective Action Deadline Date(s):

ECMC Representative: McFarland, Nick
Email: nick.mcfarland@state.co.us

Title: East Area Engineer
Phone Num: (720) 786-1208x

If you have any questions about this Warning Letter, please contact the ECMC Representative identified above.

Failure to Comply with Warning Letter:

If Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above ECMC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 525, ECMC Rules of Practice and Procedure, 2 CCR 404-1.

Disclaimers:

If the alleged violation(s) in this Warning Letter are the subject of previously issued Notice(s) of Alleged Violation ("NOAV") or Enforcement Order(s) ("Order"), Operator's obligations and the corrective actions and deadlines in such NOAV or Order stand and are not affected by this Warning Letter.

If issued in error, the Enforcement Unit reserves the right to rescind this Warning Letter prior to the ECMC Representative's receipt of Operator's notice and evidence of completion of the Corrective Action.

All well data, rules and forms are available on our website at www.colorado.gov/ecmc.

Sincerely,

McFarland, Nick
East Area Engineer

Attachments

View Attachments in Imaged Documents on ECMC website <http://ecmcweblink.state.co.us/> Search by Document Number.

Document Number Description

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Total Attach: 0 Files